

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of:)	
)	
Third Periodic Review of the)	MB Docket No. 07-91
Commission's Rules and Policies)	
Affecting the Conversion)	
To Digital Television)	
)	

To: The Secretary

COMMENTS

LATV Networks, LLC ("LATV"), a television network that distributes its bilingual music and entertainment programming primarily through digital multicasting, by its attorneys, hereby submits these Comments in the above-referenced proceeding in which the Commission requests comment on its proposals concerning the final phases of the transition to digital television ("DTV"), the introduction of DTV service and the recovery of spectrum at the end of the DTV Transition.¹ In these Comments, LATV addresses application of the Commission's analog Station identification requirements to DTV Stations. First, LATV urges the Commission to allow Program System and Information Protocol ("PSIP") data to stand in for traditional station identifications where DTV Stations are multicasting independent network programming. Second, LATV asks the

¹ See *Third Periodic Review of the Commission's Rules and Policies Affecting the Conversion to Digital Television*, Notice of Proposed Rulemaking, MB Docket No. 07-91, FCC 07-70, released May 18, 2007 ("*NPRM*").

Commission to clarify that DTV Stations have wider latitude with respect to station identifications in situations where one DTV Station is multicasting the programming of another DTV Station than currently provided for by the Commission's analog Rules. In support thereof, LATV states as follows.

In the *NPRM*, the Commission specifically requests comment on the application of its analog Station identification Rules to DTV Stations.² LATV submits that these traditional Station identification Rules should be modified to better reflect the technological capabilities of digital television, and tailored to better serve the interests and needs of DTV viewers.

First, in the context of network programming distributed via the multicast channels of DTV Stations, and in the datacasting context, LATV submits that the Commission should allow PSIP data to take the place of traditional Station identification content. Through PSIP technology, information identifying multicasting Stations can be made available to viewers directly through their digital tuners, separate and apart from the programming or data stream. LATV believes that permitting Station identification through PSIP will more closely tracks viewers' changing preferences and expectations than continuing to require broadcast Stations that multicast network programming to include their Station identifications as content within the network program. With respect to content, viewers generally wish to know only who the programming or data provider is – this information is provided through frequent network identification within the programming or data stream. It is only with respect to transmission issues that

² See *id.* at ¶¶121-123.

viewers will want to know who the underlying broadcaster is – and this information is readily accessible via PSIP data.

Second, LATV urges the Commission to grant digital broadcasters flexibility in identifying the program streams appearing in their multicast program streams, as well as in identifying other Stations' multicast channels on which their programming appears. For example, if a local broadcast Station (Station A) retransmits the signal of another local broadcast Station (Station B) on one of Station A's DTV multicast Channels, Station A should be allowed to refer to Station B in Station A's Station identification – "Station A, Channel XX.X, _____, _____ (community of license), programming provided by Station B, _____, _____ (community of license)." Similarly, based on the same scenario, Station B, in its own Station identification, should be permitted to include reference to its multicast retransmission on Station A – "Station B, Channel YY, _____, _____ (community of license), also available on Station A, Channel XX.X, _____, _____ (community of license)." Further, Station B's Station identification should be allowed to be retransmitted, intact and unaltered, as part of the programming stream retransmitted by Station A.

In sum, LATV believes that digital broadcasting poses new opportunities and challenges with respect to the Commission's traditional Station identification requirements. LATV urges the Commission to allow PSIP identifications to stand in for traditional station identifications in the multicast/network programming and datacasting contexts. LATV also urges the Commission to permit expanded Station identifications in cases in which broadcast DTV Stations are

retransmitting one another's programming streams on their multicast Channels.

The Station identification measures proposed herein will better serve the interests and needs of DTV viewers than the Commission's traditional analog Station identification requirements.

Respectfully submitted,

LATV NETWORKS, LLC

By: 

Barry A. Friedman
Thompson Hine LLP
1920 N. Street, N.W.
Washington, D.C. 20036
(202) 331-8800
Its Attorney

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